

**Region 5 State Oversight Plan**  
**4/2/14**

State	Media	Significant Issues	Resolution Steps
IL	CAA	<ul style="list-style-type: none"> <li>IL does not find complex violations that EPA finds in their state. When issues are discovered through inspections or other means (e.g., stack tests) Illinois will find minor issues, but not related complex issues that are more significant.</li> </ul>	<ul style="list-style-type: none"> <li>Region 5 is currently conducting a SRF 3 Review of IEPA and will make recommendations to resolve issues.</li> <li>EPA and IEPA will continue to discuss complex cases/violations during our monthly scheduled conference calls. EPA will provide assistance, as requested. On regular conference calls, ARD raises issues with IEPA in this regard and gets IEPA, when possible, to commit to certain actions to rectify.</li> </ul>
	CWA	[REDACTED]	[REDACTED]
	RCRA	[REDACTED]	[REDACTED]

IN	CAA	<ul style="list-style-type: none"> <li>Although IDEM's files reflect the compliance status of facilities, this information is often not included in AFS – and thus is not seen by the public.</li> </ul>	<ul style="list-style-type: none"> <li>Per the SRF draft report, IDEM will update SOPs and provide training for AFS entry.</li> </ul>
	CWA		
MI	CAA	<ul style="list-style-type: none"> <li>MI continues to have issues with complete, accurate, and timely data.</li> <li>MI does not find complex violations that EPA finds in their state. Too few HPVs are identified to consider action appropriate or timely. HPVs that are identified routinely exceed 270 days without resolution.</li> </ul>	<ul style="list-style-type: none"> <li>Region 5 is completing a SRF 3 Review of MDEQ and is negotiating recommendations to resolve issues.</li> <li>EPA and MDEQ will continue to discuss complex cases/violations during our monthly scheduled conference calls. EPA will continue to make recommendations in resolving data issues, HPVs and case resolutions. EPA will provide assistance, as requested. On regular conference calls, ARD raises issues with MDEQ in this regard and gets MDEQ, when possible, to commit to certain actions to rectify.</li> </ul>
	CWA		
	RCRA		

MN	CAA	<ul style="list-style-type: none"> <li>Due to MN Supreme Court decision and state AG interpretation, MN does not report open case data to EPA data systems if it will be released to the public through ECHO. For RCRA, data is being reported to RCRAInfo, but "flags" are being used to prevent the data from being released to the public.</li> <li>MN does not find complex violations that EPA finds in their state.</li> <li>MPCA is not conducting enough demo/reno inspections.</li> </ul>	<ul style="list-style-type: none"> <li>In regards to MPCA data issues related to the MN Supreme Court decision, R5 believes that no other steps can taken in this matter at this time and through elevation of this issue to OECA considers this issue closed as of 2/10/14.</li> <li>On regular conference calls, ARD raises issues with MPCA in this regard and gets MPCA, when possible, to commit to certain actions to rectify.</li> <li>EPA will continue to monitor MPCA to ensure the agency fully implements and enforce the asbestos NESHAP, and fulfills the clearly defined expectations of EPA's 1991 Asbestos NESHAP Implementation Strategy. Any issues that arise will be discussed during our monthly scheduled conference call. MPCA has committed to conducting more demo/reno inspections.</li> </ul>
	CWA		
	RCRA		
OH	CAA	<ul style="list-style-type: none"> <li>A number of HPVs are being resolved by OEPA through a permit modification/revision. HPV cases should be resolved through a formal enforcement action per the HPV policy.</li> <li>Data is not always being entered in a timely, accurate, and complete manner.</li> <li>Violations are often not accurately identified and high priority/significant determinations are not often made. These are identified/made in reality, but are not formally recorded in AFS as being identified/made – so it appears to EPA and the public that these things are not being done.</li> </ul>	<ul style="list-style-type: none"> <li>Current report recommendations: 1) R5 is asking OEPA to justify all cases in which a permit modification/revision is being used to resolve an HPV, 2) A plan for data issue resolution will be created if solutions are not identified through calls with the states in the near future, which includes that violation/HPV determinations are correctly entered into AFS.</li> <li>EPA and OEPA will continue to discuss complex cases/violations during our monthly scheduled conference calls. EPA will provide assistance, as requested. On regular conference calls, ARD raises issues with OEPA in this regard and gets OEPA, when possible, to commit to certain actions to rectify.</li> </ul>

		<ul style="list-style-type: none"> <li>OEPA does not find complex violations that EPA finds in the state.</li> </ul>	
	CWA		
	RCRA		
WI	CAA	<ul style="list-style-type: none"> <li>Violation identification, timeliness, and appropriateness of enforcement actions.</li> </ul>	<ul style="list-style-type: none"> <li>R5 and WDNR are working in cooperation to implement a pilot approach to SRF for WDNR's third review. Issues are being addressed through this process.</li> <li>On regular conference calls, ARD raises issues with WDNR in this regard and gets WDNR, when possible, to commit to certain actions to rectify.</li> </ul>
	CWA		
	RCRA		

*Data sources: Assessment of issues reflects information from the State Review Framework, recent ECHO data reports, and other program areas identified during ongoing state oversight.*